

Our Reference 322127
Your Reference Shepparton South East Precinct Structure Plan

15 April 2024

Gareth Hatley
Strategic Planning Manager
Victorian Planning Authority

Via email to: sheppartonsoutheast@vpa.vic.gov.au

Dear Gareth

**Submission to the Draft Shepparton South East Precinct Structure Plan & Draft Greater Shepparton Planning Scheme Amendment C117
70 Zurcas Lane, Shepparton (Property 1, 2, 4 and 8)**

Spiire is acting behalf of V and D Zurcas Pty Ltd, the owner of land on 70 Zurcas Lane, Shepparton.

The Victorian State Government has committed to addressing the lack of housing supply and housing affordability issues currently impacting Victoria. This Shepparton South East Precinct Structure Plan (PSP) provides an excellent opportunity to increase land supply and provide affordable housing. It is therefore important the final PSP is refined to ensure this can occur.

This is a submission to the draft Shepparton South East Structure Plan and draft Greater Shepparton Planning Scheme Amendment C117 which is on public exhibition until the 15 April 2024.

1. SUBMISISON OVERVIEW

Table 1: Submission Details

Amendment	Amendment C117 – Shepparton South East PSP
Submitter	Spiire on behalf of V and D Zurcas Pty Ltd
Property Address	70 Zurcas Land, Shepparton
Title Details	<ul style="list-style-type: none"> ▶ Lot 3 on TP865784 ▶ Lot 4 on TP865784 ▶ Lot 5 on TP865784 ▶ Lot 2 on TP865784
PSP Property Number	Properties 1, 2, 4 and 8
Submitter Contact	Casey Collins and Jane Macey – Spiire

The detailed submissions are set out in the following section of this letter. In summary, this submission seeks:

- ▶ Further details on the proposed Health Facility, including any compensation to be offered for the loss of developable land; timing of the acquisition of the land and construction of the facility; the type of facility proposed; and the requirement for the land to be finished to the satisfaction of the Health Department.
- ▶ Review of the extent of undevelopable land to maximise land available for development.
- ▶ Further consideration be given to affordable housing through increasing developable land, waiving/reducing development contribution costs and reduce the standard of infrastructure being provided in the Precinct.
- ▶ Reduction to the development contribution rates as these are not competitive against other regional locations.
- ▶ Review of all proposed documentation including the proposed Urban Growth Zone Schedule.

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2. SUBJECT LAND

The subject land is located 70 Zurcas Lane, Shepparton. The land comprises approximately 27.5 hectares and contains an existing dwelling and shedding. Vehicle access is via Zurcas Lane and Poplar Avenue. With the exception of number of trees around the dwelling and along the southern boundary the site is relatively clear of vegetation.

Harmony Village, an aged care facility is located to the immediate north of the site at 34 Zurcas Lane. Land to the immediate east and south is current and previous farming land contained with the PSP area. Existing residential neighbourhoods are to the immediate west. Poplar Avenue forms part of the southern boundary of the site.

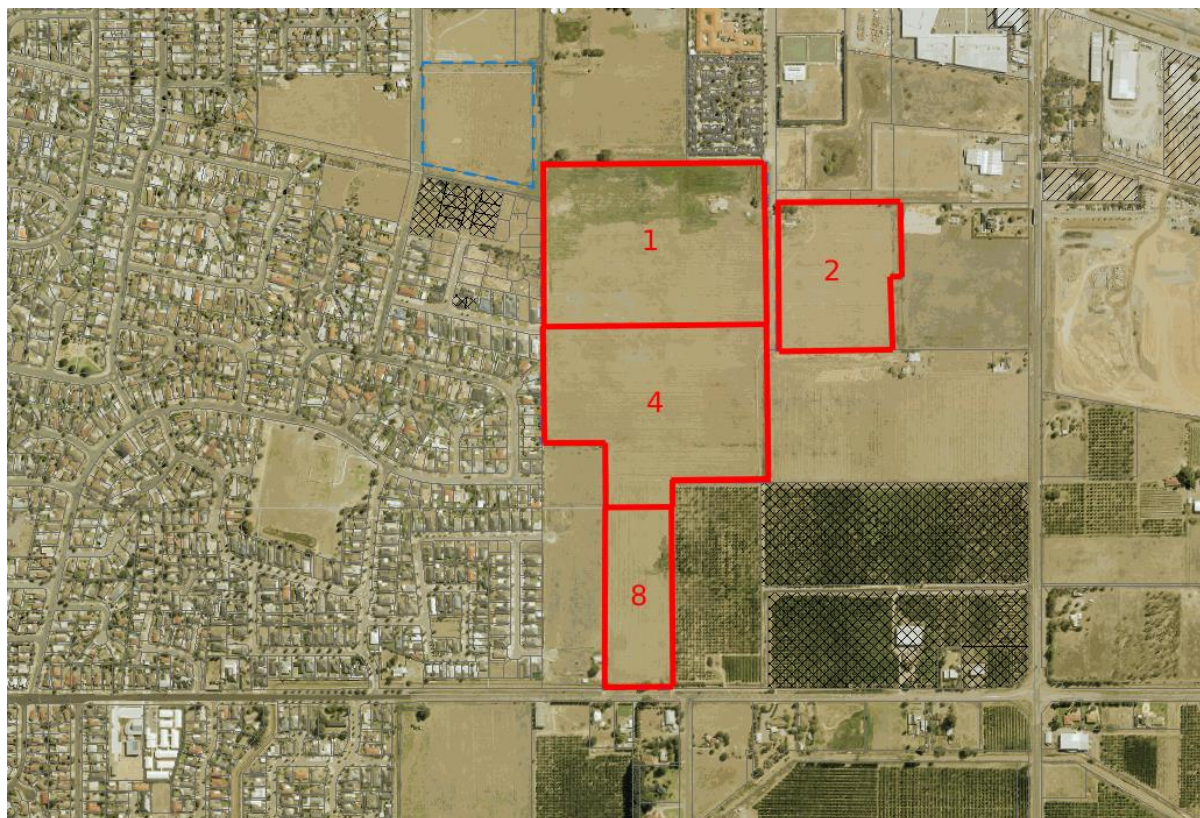


Figure 1: Site Locality Plan (Aerial)

3. GREATER SHEPPARTON PLANNING SCHEME

Pursuant to the Greater Shepparton Planning Scheme the land at 70 Zurcas Lane is within the Farming Zone - Schedule 1.

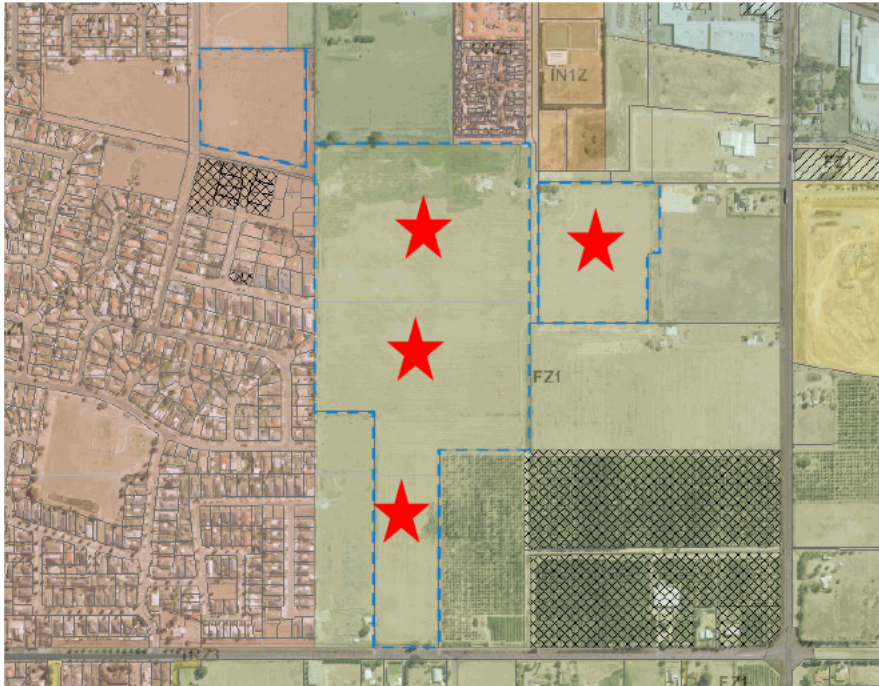


Figure 2: Zone Plan

The land is also within the Development Plan Overlay – Schedule 1 and the Specific Controls Overlay – Schedule 3.

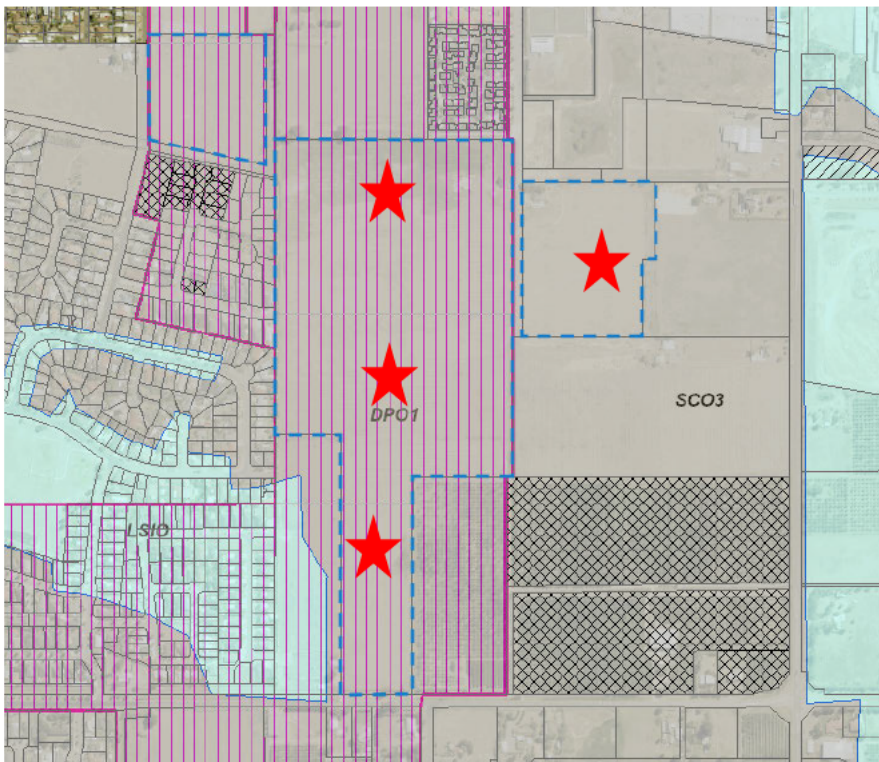


Figure 3: Overlays Plan

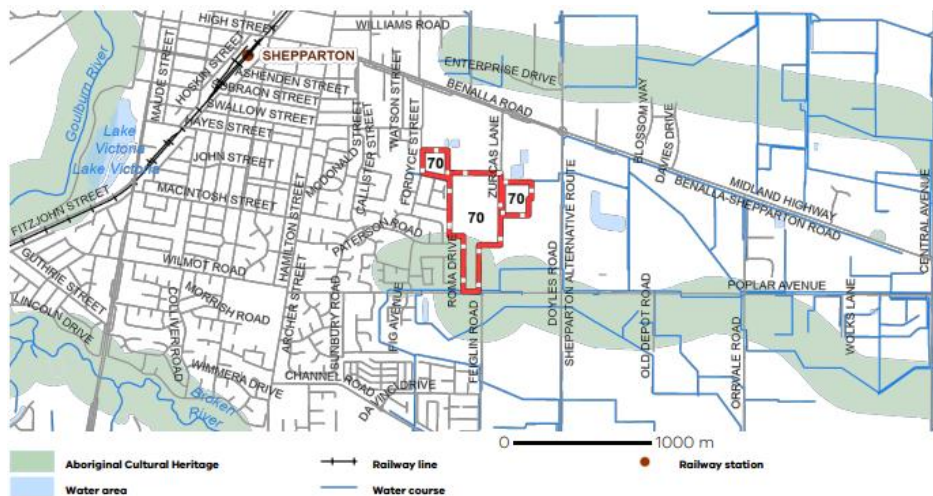


Figure 4 - Aboriginal cultural Heritage

The southern section of the property, within Properties 4 and 8, are within an area of Aboriginal cultural heritage sensitivity.

4. DRAFT SHEPPARTON SOUTH EAST PRECINCT STRUCTURE PLAN & AMENDMENT C117

4.1 DRAFT SHEPPARTON SOUTH EAST PRECINCT STRUCTURE PLAN

The subject site lies within the boundary of the draft Shepparton South East Precinct Structure Plan (PSP) and has been identified as Properties 1,2,4 and 8.

The Plan 3 (refer to Figure 5) in the draft PSP has identified the land at 70 Zurcas Lane as:

- ▶ Proposed state government health facility (Property 1)
- ▶ A local access street
- ▶ Residential
- ▶ Connector street – boulevard.

Plan 5 – Character, Heritage, and Housing has identified the southern section (Properties 4 and 8) as residential balance within an area of Aboriginal cultural sensitivity. The northern section of the property (Properties 1 and 2) is identified as residential amenity areas.

Plan 6 – Local Convenience and Employment identifies the majority of developable residential on 70 Zurcas Lane – save for a small section in the south – lies within an activity centre 800m catchment.

Plan 7 – Open space and Community facilities identifies 70 Zurcas Lane, Property 1 as having a proposed state government health facility.

Plan 8 – Bushfire Hazard Areas Identifies Property 8 of 70 Zurcas Lane as a bushfire hazard area 2 (grassland 19m setback).

Plan 9 – Road Network identifies that a connector street – level 2 boulevard (28-32m) will be constructed from the north to Benalla Road to the southern Poplar Avenue. Property 8 will have a small amount of local access street (17m) waterway corridor interface.

Plan 10 – Public transport and pathways identify the siting of a bus capable connector road, principal bicycle network and off-road shared path along the Poplar-Benalla Road level 2 boulevard.

Plan 11 – Interface impact areas establishes that Properties 1,2 and 4 on 70 Zurcas Lane will be within the northern industrial and noise influence area (300m)

Plan 12 – The southernmost frontage of Property 8 on 70 Zurcas Lane will have a drainage channel flowing westwards towards the RBWL2 (West) retarding basin.

Plan 13 – Infrastructure and development staging places two stages upon 70 Zurcas Lane. The first stage will be short term 0-5 years and will focus on Properties 1, 2 and 4. Property 8 will be medium term 5-15 years.

The Land Valuation Assessment – March 2023 only lists Property 8 of 70 Zurcas Lane within the land valuation. The total compensation will be \$43,828 for 0.11ha.

Properties 1,2 and 4 are not valued in this report.



Figure 5: Extract from the Draft Precinct Structure Plan

4.2 DRAFT GREATER SHEPPARTON PLANNING SCHEME AMENDMENT C117

The draft Amendment Documentation for Greater Shepparton Planning Scheme Amendment C117 proposes to make the following changes to the subject site:

- ▶ Rezone to Urban Growth Zone – Schedule 2 (the applied zone Clause 32.08 General Residential Zone)
- ▶ Identify land for the construction of a State Government health facility.

5. CLARIFICATION AND REQUESTED CHANGES

Upon review of the draft PSP and the Amendment, our client seeks clarification on several matters and request the following changes be made before the PSP and Amendment is approved.

5.1 State Government Health Facility

Our client seeks further details on the proposed health facility to be sited on Property 1 and details on any compensation to be provided for the loss of developable land. Clarification is also sought regarding the type of facility to be built, the timing of the acquisition of the land and the timelines for construction.

Our client also objects to Guideline 23 which requires the land to be provided to a finished standard which satisfies the requirements of Department of Health.

5.2 Extent of Net Developable Land

The PSP area comprises 385 hectares, of which 250 hectares (65%) is identified as developable land. Whilst land does need to be set aside for infrastructure, recreational and community facilities to service the Precinct, the provision of land for open space (21.5% of the Precinct) and community facilities appears to be excessive. This impacts the net developable land available, which in turn increases the per hectare rate of development costs. It is requested the extent of undevelopable land be reviewed.

5.3 Housing Affordability

As VPA and Council are aware the provision of land supply and housing affordability across Victoria is a significant issue. If all levels of Government are committed to improving housing affordability, all levels of Government should assist with funding the development of this Precinct and/or explore ways to assist developers to provide residential land in an affordable way.

The proposed PSP is to provide approximately 2,500 dwellings, which forms a crucial component of the dwellings to meet State Government housing target. Given this, the State Government/VPA and Council should look to waive costs such as the Strategy Planning costs (included in the Development Contributions Plan – see Figure 7 over the page), and also significantly fund the upgrade of intersections along Doyles Road. Doyles Road is a National and State freight route, and already carries significant traffic, with these intersections currently experiencing regular incidents or near misses. It should not be the responsibility of residential land providers to fully fund the upgrades and improvements this freight route requires.

The community facilities proposed to be provided in the PSP appear to be excessive, and it is considered the background assessments do not adequately substantiate such infrastructure for this Precinct. It is unclear why the Precinct would fully fund the construction of a multi-purpose children's centre (estimated cost over \$10million) when this facility will also be utilised by those living in the established residential neighbourhoods of Shepparton. It is submitted the scale of these items be reviewed; Government contributions be included on behalf of the established residential areas which will likely use and benefit from the infrastructure; and joint ventures explored with the private sector to fund/provide these facilities.

5.4 Development Contributions

The proposed Development Contributions for land within the PSP is \$411,223/hectare, which comprises levies per facility as shown in Figure 5 below.

Facility	Levies payable by the development	
	Development Infrastructure	Community infrastructure
	All development per net developable hectare	Residential per dwelling
Transport	\$91,574	\$0
Community facility	\$110,852	\$0
Drainage	\$160,256	\$0
Strategic planning	\$9,960	\$0
Early developer works	\$38,580	\$0
TOTAL	\$411,223	\$0

Figure 5: Extract from Development Contributions Plan Overlay Schedule 5 (Amendment C117gshe)

Based on the density of development referenced in the PSP of 10 dwellings per hectare, this equates to a levy of \$41,122/lot. The following table provides a comparison between other regional PSP recently approved:

Table 2: Comparison of similar regional DCP rates/hectare

Municipality	PSP Area	Development Contributions/hectare
Campaspe	Echuca West	\$149,509
Greater Bendigo	Huntly	\$95,381
Ballarat	Ballarat West	\$147,753.24
Greater Shepparton	Shepparton North East	\$146,793
Bass Coast	Wonthaggi North East	\$258,421
Greater Shepparton	Shepparton South East	\$411,2223

The proposed development contributions for this PSP are significantly higher than many other regional PSP areas which will have direct implications on the feasibility of developing this Precinct, let alone on the provision of affordable housing.

A thorough review of the development costs needs to be undertaken, including for these levies:

- ▶ Transport cost apportionment needs to be equitable. For example, the cost for the Doyles Road/Channel Road roundabout and the Doyles Road/Poplar Avenue intersection upgrades should be apportioned between all beneficiaries, including National and State Governments. As identified in Table 4.3 of the Transport Impact Assessment (Stantec, 13 September 2023) the ultimate traffic volumes at Doyles Road/Channel Road intersection (2031) will equate to 68%, yet the Precinct is nominated to fund 100% of these upgrades.
- ▶ Transport costs could also be reduced through the removal of pedestrian crossings along Doyles Road. Doyles Road is a significant freight route which needs to be protected. The 2050 Growth Plan restricts/limits residential development of land on the eastern side of Doyles Road, therefore pedestrian crossings are considered unnecessary. These are also likely to pose a safety risk.
- ▶ Extent of recreational and community facilities provided in the Precinct, refer to Section 5.4 above.
- ▶ Extent of undevelopable land provided in the Precinct, refer to Section 5.3 above.
- ▶ Waive the 'early developer works' fees.
- ▶ Review proposed cross sections.

5.5 Review Amendment Documentation

A thorough review of all amendment documentation should be undertaken, in particular the proposed Schedule 2 to the Urban Growth Zone. The following should be considered (but not limited to):

- ▶ Section 2.4 requires the interim construction Doyles Road intersections to occur when planning approval is granted for more than 800 residential lots in the Precinct. This is likely to be a significant deterrent to developers.

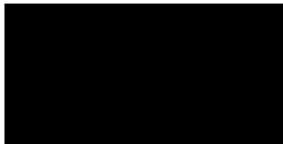
- ▶ Section 2.5 & Section 3 requires a sodic and/or dispersive report/management plans be prepared. The Land Capability Assessment prepared by SMEC recommended “*sodic soil risk be documented within a Construction Environmental Management Plan (CEMP) which lists the required controls to manage sodic soils.*” It is considered this a more appropriate approach.
- ▶ Section 3 – refers to incorrect AS3959, should be 2018, not 2009.
- ▶ Section 3 – landowners/developers should not be responsible for the construction or costs of construction of pedestrian/shared pathways not located on or along the frontage of their land.

As detailed above, this submission seeks:

- ▶ Further details on the proposed Health Facility, including any compensation to be offered for the loss of developable land; timing of the acquisition of the land and construction of the facility; the type of facility proposed; and the requirement for the land to be finished to the satisfaction of the Health Department.
- ▶ Review of the extent of undevelopable land to maximise land available for development.
- ▶ Further consideration be given to affordable housing through increasing developable land, waiving/reducing development contribution costs and reduce the standard of infrastructure being provided in the Precinct.
- ▶ Reduction to the development contribution rates as these are not competitive against other regional locations.
- ▶ Review of all proposed documentation including the proposed Urban Growth Zone Schedule.

We welcome opportunity to discuss our submission further with Council. With any queries or to arrange a meeting time, please contact me on [REDACTED] or Casey Collins on [REDACTED]

Yours sincerely



Jane Macey
Principal Planning